

EXHIBIT 3

Friday, February 21, 2025 at 16:29:38 Eastern Standard Time

Subject: Re: Cranmore v. Parts Authority, LLC et al. [24-cv-05842]
Date: Thursday, February 20, 2025 at 6:26:33 PM Eastern Standard Time
From: Galen Baynes
To: Jason Mizrahi, Joshua Levin-Epstein
CC: Hugo Espinoza, Lou Pechman, Camille Sanchez

Jason,

Please note that the rules require that counsel be available to meet and confer within 48 hours of receiving a request from the initiating party. It has now been two months since plaintiff served discovery requests, and the Workforce Defendants have not produced any responsive documents and have lodged only boilerplate objections to the requests.

Please confirm a time for the meet and confer tomorrow.

Regards,

--

Galen C. Baynes
Partner
Pechman Law Group PLLC
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New York, New York 10022
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Fx. (212) 409-8763
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From: Jason Mizrahi <Jason@levinepstein.com>
Date: Thursday, February 20, 2025 at 6:08 PM
To: Galen Baynes <baynes@pechmanlaw.com>, Joshua Levin-Epstein <Joshua@levinepstein.com>
CC: Hugo Espinoza <Hugo@levinepstein.com>, Lou Pechman <pechman@pechmanlaw.com>, Camille Sanchez <sanchez@pechmanlaw.com>
Subject: RE: Cranmore v. Parts Authority, LLC et al. [24-cv-05842]

Hi Galen,

How is Monday or Tuesday next week?

Jason Mizrahi, Esq.
Levin-Epstein & Associates, P.C.
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New York, NY 10165
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From: Galen Baynes <baynes@pechmanlaw.com>

Sent: Thursday, February 20, 2025 5:48 PM

To: Jason Mizrahi <Jason@levinepstein.com>; Joshua Levin-Epstein <Joshua@levinepstein.com>

Cc: Hugo Espinoza <Hugo@levinepstein.com>; Lou Pechman <pechman@pechmanlaw.com>; Camille Sanchez <sanchez@pechmanlaw.com>

Subject: Re: Cranmore v. Parts Authority, LLC et al. [24-cv-05842]

Good afternoon,

Following up on our below request for a meet-and-confer regarding the Workforce Defendants' discovery deficiencies per Rule 4(C) of Judge Liman's individual rules. I am available throughout the day tomorrow for the meet-and-confer except for between 10 and 10:30 a.m. Please advise.

Regards,

--

Galen C. Baynes

Partner

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From: Galen Baynes <baynes@pechmanlaw.com>

Date: Wednesday, February 19, 2025 at 4:22 PM

To: Jason Mizrahi <Jason@levinepstein.com>, Joshua Levin-Epstein <Joshua@levinepstein.com>

Cc: Hugo Espinoza <Hugo@levinepstein.com>, Lou Pechman <pechman@pechmanlaw.com>, Camille Sanchez <sanchez@pechmanlaw.com>

Subject: Re: Cranmore v. Parts Authority, LLC et al. [24-cv-05842]

Good afternoon,

This is a request for a meet-and-confer pursuant to FRCP 37 and Judge Liman's Individual Practices

in Civil Cases regarding the Workforce Defendants' deficient responses and objections Plaintiff's December 20, 2024 first set interrogatories and document requests.

The Workforce Defendants' deficient interrogatory responses are unsigned, unsworn, contain blanket objections, and fail to identify all individuals whose identities are requested. We request that the Workforce Defendants produce compliant and fully responsive interrogatory responses.

The Workforce Defendants have not produced a single document in response to Plaintiffs' document requests and advance the same blanket, copy-and-paste objection to each of the requests. All responsive documents must immediately be produced. We note that Plaintiff has already twice consented to the Workforce Defendants' requests for extensions of time to serve responses and objections and produce responsive documents, which were originally due on January 19, 2025.

Please confirm your availability for a meet-and-confirm tomorrow (2/20) or Friday (2/21) in accordance with Judge Liman's individual rules.

Regards,

--

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From: Hugo Espinoza <Hugo@levinepstein.com>

Date: Wednesday, February 19, 2025 at 2:30 PM

To: Galen Baynes <baynes@pechmanlaw.com>, Lou Pechman
<pechman@pechmanlaw.com>

Cc: Jason Mizrahi <Jason@levinepstein.com>, Joshua Levin-Epstein
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Subject: Cranmore v. Parts Authority, LLC et al. [24-cv-05842]

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Counselors,

Good Afternoon.

Enclosed herein, please see Defendants' responses and objections to Plaintiff's Interrogatories and first set of document requests.

Thank you for your attention to the foregoing.

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